

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE *et al.*,

Plaintiffs,

v.

Civil Action No. 3:17cv601

JASON GOODMAN *et al.*,

Defendants.

RESPONSE TO MOTION FOR PROTECTIVE ORDER AND
NOTICE OF PARTIES' AGREEMENT

NOW COMES Defendant, Patricia Negron, by counsel and confirms that she agrees to the terms of the Protective Order filed today by Plaintiff. In addition, Defendant Goodman has advised undersigned counsel that he is in agreement with the Order as well (See attached email).

Dated: August 7, 2019

Respectfully submitted,

PATRICIA A. NEGRON

By: /s/ R. Johan Conrod, Jr.
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Counsel for Defendant Patricia A. Negron

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2019, a true copy of the foregoing was filed electronically using the CM/ECF system, which will send a notification of such filing to the following:

Steven S. Biss (VSB No. 32972)
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And sent via email to:

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/s/ R. Johan Conrod , Jr.
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Conrod, R. Johan

To: Conrod, R. Johan
Subject: FW: Stipulated Protective Order

From: Jason Goodman [mailto:truth@crowdsourcethetruth.org]

Sent: Wednesday, August 7, 2019 9:57 AM

To: Steven Biss <stevenbiss@earthlink.net>

Cc: Conrod, R. Johan <rjconrod@kaufcan.com>

Subject: Re: Stipulated Protective Order

Upon further consideration and after conversation with Mr. Conrod, I will accept the document without my added paragraph 14. Go ahead and file it.